IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

GMAC BANK, a Utah Industrial Bank

CIVIL ACTION

Plaintiff,

vs.

HTFC CORPORATION,

Defendant.

No. 06-5291

PLAINTIFF, GMAC BANK'S MOTION TO COMPEL THE DEPOSITION OF AARON WIDER

Plaintiff, GMAC Bank, a Utah Industrial Bank ("GMAC Bank"), by and through its undersigned counsel, hereby moves, pursuant to Federal Rules of Civil Procedure 30 and 37, for an Order: (1) compelling Aaron Wider ("Wider"), Chief Executive Officer and sole shareholder of Defendant, HTFC Corporation ("HTFC") to appear for the completion of his deposition and to fully answer the questions he improperly refused to answer and/or provided evasive or incomplete answers to at his previous deposition; (2) requiring HTFC to pay the expenses incurred by GMAC in taking the previous deposition and making this Motion, including its reasonable attorney's fees and costs; and (3) ordering that in the event that Wider refuses to comply, judgment will be entered against HTFC as to both GMAC Bank's Complaint and HTFC's Counterclaim.

The grounds for this Motion are more fully set forth in GMAC Bank's accompanying Memorandum of Law, which is incorporated by reference.

Dated: November 28, 2007

KLEINBARD BELL & BRECKER LLP

By:_____/s/

ROBERT B. BODZIN, #31323 MELISSA C. PRINCE, #92553 One Liberty Place, 46th Floor 1650 Market Street Philadelphia, PA 19103 (215) 568-2000

Attorney's for Plaintiff, GMAC Bank, A Utah Industrial Bank

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CERTIFICATION PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 37(a)(2)(A) AND LOCAL RULE OF CIVIL PROCEDURE 26.1(f)

I, ROBERT B. BODZIN, hereby certify that I have conferred with counsel for HTFC in an effort to obtain the discovery that is the subject of this motion and that the parties were not able to resolve this dispute.

/s/	
ROBERT B. BODZIN	